

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

This work plan applies to all activities that are carried out in the 2011-2012 Federal Fiscal years (October 1, 2010 thru September 30, 2011 and October 1, 2011 thru September 30, 2012), using funds allocated pursuant to §105 of the Federal Clean Air Act (CAA). These funds were allocated to the State of Nebraska via a grant to the Nebraska Department of Environmental Quality (NDEQ), and subsequently passed on to the Lincoln Lancaster County Health Department (LLCHD) for the activities set forth in this work plan. LLCHD is required to make a 40% match with local funds

There are 4 major parts to this work plan

- I. Program Commitments
- II. Federal Grant Requirements
- III. Disbursements
- IV. Authorization
- V. Attachments

Reports required under this work plan:

1. Reports submitted as described in Part I.A 1-4.
2. Financial Reports submitted with invoices as described in Part I.0.10.
3. Annual MBE/WBE report as described in Part II.
4. Reimbursement Requests as described in Part III.

NDEQ Contact Information

Technical Issues: Chris Hetzler (471-0007) chris.hetzler@nebraska.gov or
Jim Yeggy (471-2142) jim.yeggy@nebraska.gov

Budget & Reimbursements: Tracy Thompson (471-4272) tracy.thompson@nebraska.gov

Grant Requirements: Tracy Thompson (471-4272) tracy.thompson@nebraska.gov

MBE/WBE Submittals: Stephanie Vap-Morrow (471-7784) stephanie.vap-morrow@nebraska.gov

All written correspondence, reimbursement requests and MBE/WBE reports should be directed to the appropriate person at the address below:

Nebraska Department of Environmental Quality
1200 'N' Street, The Atrium, Suite 400
PO Box 98922
Lincoln, NE 68509-8922

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

PART I. §105 Program Commitments	Time Table
<p>A. Reports</p> <p>LLCHD shall submit reports via email to NDEQ as follows.</p> <ol style="list-style-type: none"> 1. When Due: Semi-Annual: April 30th (for the period October 1-March 31st) and Annual: Oct 30th 2. Mode of Submittal: Email 3. Point of Contact: Submit reports via email to Tracy Thompson at tracy.thompson@nebraska.gov. 4. Format: See attachments (Attachment B for semi-annual, Attachment B and C for annual) 	<p><u>Semi-Annual</u> April 30th 2011 April 30th, 2012 <u>Annual</u> October 30th 2011 October 30th 2012</p>
<p>B. Planning and SIP Management Activities: LLCHD Program Regulations and Standards Modifications</p> <ol style="list-style-type: none"> 1. Continue local & state review and as necessary revise LLCAPCPRS to address environmental priorities, and to incorporate Federal Regulations promulgated pursuant to the 90 CAAA. Activities related to new NAAQS, MACT standards and Air toxics (40 CFR Parts 60, 61, 62, and 63) are anticipated. 2. The LLCHD will follow local regulation & departmental policies concerning public processes associated with regulation development and proposals. <ol style="list-style-type: none"> a. NDEQ will be included in the mailing list for all meeting notices related to regulation or policy change. b. LLCHD agrees to submit draft copies or summary information concerning planned testimony on Title 129 or SIP modifications, at least one week prior to EQC hearings, legislative hearings, etc. This commitment does not preclude the LLCHD from making changes to planned testimony, particularly if new information becomes available. If changes are made, LLCHD will provide the NDEQ with as much advanced notice as possible. 3. Initiate implementation of new regulatory requirements as expeditiously as possible upon completion of the administrative approvals necessary for promulgation. 4. Take action to identify sources impacted by regulatory changes and disseminate information as appropriate in regard to promulgation of new regulations. 	<p>Ongoing</p>

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

§105 Program Commitments	Time Table
<p data-bbox="90 243 1019 317">C. Planning and SIP Management Activities: State Implementation Plan (SIP) Modifications</p> <ol data-bbox="90 317 1019 695" style="list-style-type: none"><li data-bbox="90 317 1019 390">1. LLCHD will ensure their rule/regulation changes are consistent with the SIP.<li data-bbox="90 390 1019 495">2. LLCHD will provide NDEQ, within 30 days after adoption by the City Council/Mayor, all necessary documentation of rule/regulation changes to be incorporated into the SIP.<li data-bbox="90 495 1019 600">3. NDEQ will initiate the activities necessary for implementation of SIP modifications as expeditiously as possible upon completion of the necessary administrative approvals.<li data-bbox="90 600 1019 695">4. LLCHD will review and when appropriate, prepare comments on proposed State and Federal Regulations and policies that may impact the Lincoln Lancaster County Air Quality Program.	<p data-bbox="1019 243 1252 317">Ongoing</p>

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

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FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

§105 Program Commitments	Time Table
E. Hazardous Air Pollutant Program: <ol style="list-style-type: none"> 1. NDEQ will provide any outreach and compliance assurance material generated by them, or supplied by the EPA targeted area sources subject to MACT standards and prepare and/or distribute MACT/NESHAPs training materials for the regulated community, inspectors, and permit writers as needed and as resources allow. 2. As referenced in item D above, complete a comprehensive air toxics inventory for stationary, mobile and area sources. 3. LLCHD will send a copy to NDEQ of any final 112(g) determinations within 60 days of permit issuance. 4. LLCHD will send to NDEQ and EPA copies of Initial Notification and Compliance Certification for MACT sources it receives when it is not apparent that NDEQ or EPA has received a copy. 5. LLCHD will target area sources for inspection in the Compliance and Inspection plan for FFY2011 and FFY2012 	Annual or as needed
F. Compliance and Enforcement Activities: <ol style="list-style-type: none"> 1. Inspections-Air Emission Sources Except Asbestos NESHAPs <ol style="list-style-type: none"> a. LLCHD will implement EPA's Compliance Monitoring Strategy dated April 2001. b. LCHD will follow the Policy on Timely & Appropriate Enforcement to High Priority Violations (T&A, dated 12/22/98). 	Ongoing
<ol style="list-style-type: none"> 2. Inspections-Asbestos NESHAPs Program <ol style="list-style-type: none"> a. LCHD will inspect at least 40% of all asbestos removal projects provided not more than 100 notifications are received. Targeting priorities will include: the existence of complaints received on the project, the past compliance history of the contractor, the size of the project (i.e. larger projects will get a higher priority), and the need to inspect all contractors if possible. b. LLCHD will maintain standard operating procedures to be used during asbestos inspections. The SOPs will deal with personal protection, friability and adequate wetting determinations, sampling and chain-of-custody. When present, asbestos containment enclosures will be entered as part of the routine inspection protocol, so that work practices can be observed as closely as possible. c. Landfills, in LLCHD's jurisdiction, accepting NESHAPs asbestos wastes will be inspected periodically to assess compliance status with respect to work practices, record keeping and reporting requirements. d. LLCHD will continue to submit NESHAPs information via an Excel spreadsheet to NDEQ on a quarterly basis. 	Semi-Annual
<ol style="list-style-type: none"> 3. Compliance Reports-LLCHD will review all reports submitted by non-Title V sources in fulfillment of permit requirements to determine compliance with applicable requirements. 	As needed

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

§105 Program Commitments	Time Table
<p>F. Compliance and Enforcement Activities:</p> <p>4. EPA/DEQ Inspections</p> <ul style="list-style-type: none"> a. NDEQ will provide LLCHD with at least a 14 day advance notice of any Lincoln Lancaster County air source inspection activity to be conducted by NDEQ for the purpose of monitoring compliance with regulations which Lincoln Lancaster County has adopted. The LLCHD will be provided an opportunity to participate in these inspections. The EPA or NDEQ may participate in LLCHD led inspections. b. When NDEQ is notified that EPA is conducting compliance activity in Lincoln Lancaster County that is not related to compliance with local regulations (e.g. CFC and mobile source inspections), NDEQ will provide the LLCHD with advance notice of said activities to the extent possible. c. NDEQ shall send LLCHD copies of all reports related to inspections conducted in Lincoln Lancaster County, which it receives. The reports shall be submitted as soon as possible after the completion of the inspections. If business confidentiality is claimed by the source, the inspection report may not be fully available for review. 	Semi-Annual
<p>5. Enforcement</p> <ul style="list-style-type: none"> 1. LLCHD will issue Notices of Violation promptly upon discovery of violations. The notice of violation will contain an order to correct the deficiency. Sources will be required to return to compliance within 60 days unless circumstances require a longer compliance schedule to be approved by LLCHD. <ul style="list-style-type: none"> a. In general, NDEQ and LLCHD will assume the enforcement lead for violations identified by their respective programs. However, there may be instances where it would be more appropriate for either NDEQ or LLCHD to take the lead for a violation cited by the other agency. These cases will be discussed to determine any impediments to enforcement, and which agency is best suited to address the violations. 2. Violations that are identified as High Priority Violation will be addressed by LLCHD by generally following the Policy on Timely and Appropriate Enforcement to High Priority Violations (T&A) dated December 22, 1998 and in accordance with the current Performance Partnership Agreement. 3. LLCHD will promote Pollution Prevention in Enforcement Settlements when appropriate. 4. NDEQ and LLCHD will share compliance related information in order to support enforcement cases being pursued by either agency. 5. NDEQ and LLCHD will share information across internal divisions so as to identify multimedia pollution problems. This shared information will be used to target sources for multimedia inspection activities. Multimedia inspection and targeting strategies will be discussed every other month at the compliance and enforcement teleconferences or meetings. 	Semi-Annual
<p>6. Open Burning: LLCHD will review open burning requests for potential sites located in Lancaster County. Burning permits will be issued or denied in accordance with appropriate regulations.</p>	Semi-Annual

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

§105 Program Commitments	Time Table
F. Compliance and Enforcement Activities:	
<p>7. Acid Rain</p> <ol style="list-style-type: none"> 1. LLCHD will work with NDEQ to implement acid rain activities and report information to NDEQ. 2. LLCHD will continue to review all acid rain permits and permit modifications. 3. LLCHD will observe Relative Accuracy Testing Audits (RATAs) and perform detailed desk audits of test results of Phase II affected units, as resources allow. 	<p>Semi-Annual (7.1)</p> <p>Ongoing (7.2,7.3)</p>
8. LLCHD staff will provide data which results in a source's re-classification to the data manager as soon as practicable.	Ongoing
9. LLCHD will keep NDEQ apprised of penalty amounts as a result from enforcement actions.	Ongoing
10. LLCHD will include all applicable requirements in inspection reports, especially any MACT requirements.	Ongoing
11. LLCHD will ensure that all enforcement documentation, including penalty calculations is part of the file.	Ongoing
12. LLCHD will ensure that all inspection cover letters and a signed copy of the report will be included in each source file.	Ongoing
13. LLCHD will review each excess emission and coal analysis report received. LLCHD will notify NDEQ if any report exceeds 5% excess emissions or 5% monitor downtime. This is based on the emission unit's operational time.	Semi-Annual
14. On-Site and Phone Technical and Compliance Assistance: LLCHD Air Program staff will provide compliance and technical assistance on air quality regulations to non-Title V sources.	As needed
G. Construction Permit Activities:	
1. Review permit applications for new and modified non-PSD sources of air pollutants and issue permits in accordance with the approved SIP. Permit conditions and limitations shall be written in a federally enforceable manner. All public notices will be provided to the NDEQ. Copies of applications, draft permits, fact sheets and statements of basis will be provided to NDEQ or EPA upon request.	
2. LLCHD will submit to NDEQ construction permit information concerning project description, type of permit (e.g. PSD, Part D, synthetic minor, as built, NSPS & NESHAPs), and the permit reviewer upon request.	As needed
3. NDEQ will notify the LLCHD of any concerns with proposed permits within the 30-day public notice period. The LLCHD will provide a response to any NDEQ and/or EPA comments received.	
4. To facilitate permit review, the LLCHD will make files available at their respective offices for EPA/NDEQ review.	
5. LLCHD will notify NDEQ prior to issuing a variance or waiver from air pollution rules or regulations.	
6. LLCHD will send a copy of PSD permit applications and supplemental information to NDEQ and EPA within two weeks after receipt of such information.	

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

7. LLCHD will send a copy of each PSD public notice package to NDEQ and EPA no later than the start of the public comment period. The package will include a copy of the draft permit, a fact sheet, and the public notice.	
8. LLCHD will send a copy of each final PSD permit package to NDEQ and EPA within two weeks of finalization. The final package will include a copy of the final permit decision, response summaries, and any other supporting materials.	
9. LLCHD shall submit Best Available Control Technology/Lowest Achievable Emission Rate (BACT/LAER) decisions to EPA's national clearinghouse no later than 30-days of permit issuance. Is this just for PSD?	
10. LLCHD will review and comment on submitted dispersion modeling in accordance with the SIP and other state and EPA regulations.	
11. For draft PSD permits reviewed by NDEQ and/or EPA and for which confidential information has been received by the LLCHD, the LLCHD will notify the source of its obligation to provide copies of such information to the NDEQ and/or EPA in order for the NDEQ and/or EPA to complete its review.	
12. Where appropriate and resources allow, LLCHD will conduct screening analysis for toxics when issuing construction permits and make that information available to the public.	
13. LLCHD will incorporate into their SIP, the updated NSR/PSD Reform construction rules in Title 129, Chapter 19 which was signed by Governor Heineman December 2010.	December 2011
H. Operating Permits:	
1. Review permit applications, and develop and issue non-Title V Class II operating permits as needed. Permit conditions and limitations shall be written in a federally enforceable manner. Copies of public notices, applications, draft permits, fact sheets and statements of basis will be provided to NDEQ or EPA upon request.	
2. To facilitate permit review, the LLCHD will make files available at their office for NDEQ/EPA review.	
3. LLCHD will issue warning letters or will take enforcement action when sources do not comply with Part 70 application requirements regarding renewal applications being submitted less than six months prior to the expiration of the permit.	Ongoing
4. LLCHD will ensure that the credible evidence language rule which is now being included in all Title V permit renewals will be included in all future non-Title V renewals.	Ongoing
5. LLCHD will ensure that all pre-construction permit changes will be public noticed and any conditions noted in an operating permit will be consistent with those in an applicable construction permit.	Ongoing

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

§105 Program Commitments	Time Table
H. Operating Permits: 6. LLCHD will ensure that a statement of basis is always prepared for all operating and construction permits. LLCHD will strive to fully explain the provisions of each permit and reasons for omitting any other provisions that might only appear to be applicable to the source or process.	Ongoing
I. § 105 Ambient Monitoring : Network Operations 1. LLCHD shall operate the ambient network described in <i>Attachment A: LLCHD § 105 Air Monitoring Network Summary Description</i> . Changes to the network may be made due to shifting monitoring priorities and/or monetary constraints. Prior NDEQ approval is required for such changes. Unplanned site losses may also result in network modifications. See subsections below for more information relative to network modification requirements.	Ongoing
2. The ambient network shall be operated so as to comply with the requirements set forth in 40 CFR Part 58.	Ongoing
3. The ambient network shall be operated in accordance with applicable Quality Assurance Project Plans and Standard Operating Procedures (Also see Subsection L below).	Ongoing
4. The ambient network shall be operated so as to achieve at least 75% complete data from each monitor in each calendar quarter	Ongoing
5. LLCHD shall provide prior written requests to NDEQ for network changes that include basis documentation, and/or request for technical support to provide basis documentation.	Ongoing
6. In the event of unplanned loss of a site (e.g., storm damage, building eviction), oral notice shall be promptly provided, with a follow-up written notice (mail or email) within 30 days. The written notice shall include a plan for re-locating or discontinuing the site, including basis documentation and/or technical support request.	Ongoing as needed
7. LLCHD will review sites to ensure they comply with the siting criteria set forth in 40 CFR Part 58 Appendix E (8) using the site review checklist provided by the NDEQ. Retain checklist as documentation of site reviews for at least 3 years.	All sites reviewed by May 1 st

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

§105 Program Commitments	Time Table
J. Annual Network Reviews: 1. Annual Reviews: By May 1, LLCHD shall conduct an annual review of the ambient network to ensure that it meets the monitoring objectives defined in 40 CFR, Part 58, Appendix D and to examine network effectiveness. Network reviews will consider the following: a. Changes needed to implement changing Federal and state priorities, such as those associated with the Regional Air Monitoring Strategy and Phase I of Ncore Level II; b. Data reviews with respect to NAAQS compliance and inter-site correlations; and c. Any new or revised modeling results that may be available.	Complete review in May
2. Annual Reports: By May 15, submit a written network review report. This report shall include: a. A description of any network changes in the previous and current calendar year, b. Any network change recommendations and their basis for the remainder of the calendar year; and c. Any technical review and/or support needs (e.g., modeling assistance) anticipated for the next year	Report due by June 1 st
K. Ambient Monitoring AQS Data Submittal 1. Data Submittal: LLCHD shall submit all ambient air quality data to AQS within 90 days of the close of the following calendar quarters. January 1-March 31, April 1-June 30, July 1-September 30, and October 1-December 31. The data submitted shall include raw data as well as accuracy, precision and bias data. The data shall be coded into the AIRS-AQS format and submitted via electronic transmission. Data submitted to AQS shall be edited and validated prior to submission. Operational data shall be reported in accordance with 40 CFR Part 50, Appendix L.	Quarterly
2. Data Review: Following quarterly submittal of monitoring data, LLCHD shall retrieve AQS data using the AMP 450 report format to verify that data submittal is complete, and to review NAAQS compliance.	Quarterly
L. Ambient Monitoring: Quality Assurance: 1. LLCHD shall maintain and follow Quality Assurance Project Plans (QAPPs) and Standard Operating Procedures that comply with the Federal requirements set forth 40 CFR Part 58 and EPA QA/R-5 <i>EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations</i>	Ongoing
2. LLCHD shall either follow QAPP and SOP procedures developed by the NDEQ, or develop and follow their own QAPPs and/or SOPs.	Ongoing
3. NDEQ and LLCHD will coordinate in the review and possible updates of QAPPS and SOPs pertinent to this work plan.	Ongoing

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

§105 Program Commitments	Time Table
L. Ambient Monitoring: Quality Assurance: 4. If LLCHD utilizes its own QAPP and /or SOPs, the following requirements apply: <ol style="list-style-type: none"> QAPP and SOPs must comply with all EPA requirements (i.e., 40 CFR Part 58 & EPA QA/R-5); LLCHD SOP developed under the NDEQ QAPP must be consistent with NDEQ's QAPP; QAPP and SOPs, and modifications must be submitted to NDEQ for review and approval; LLCHD shall address any NDEQ comments or change requests that apply to QAPPS and SOPs; and QAPPS must be reviewed annually in accordance with the requirements set forth in EPA QA/R-5 	Ongoing as applicable
5. The standards used in the checks and audits must be certified and their certifications kept current.	Ongoing
M. Audit Participation	
1. LLCHD shall participate as requested in audits conducted by EPA, NDEQ or contractors representing these agencies.	Ongoing as needed
2. LLCHD shall address and correct any deficiencies recognized in said audits. In the event an audit finds deficiencies or requests corrective actions, LLCHD shall submit a response to NDEQ (Tracy Thompson) and/or EPA as appropriate, within 45 days of receiving the final audit report. Said response shall describe corrective actions to be taken and a timetable for completing them.	When needed response due in 45 days
N. Ambient Monitoring: Equipment Purchases	
1. When requested by NDEQ, provide a list of planned equipment purchases. Typically such requests are made in the 1 st and 4 th quarter of each calendar year to satisfy Federal grant reporting requirements. A one-year planning period is typically requested, and information needs include: equipment description, approximate cost and funding source(s).	Ongoing when requested
2. Maintain a list of all equipment purchases made in the current Federal fiscal year, and report the list as an attachment to the work plan annual report. Include the following information in the lists: equipment description, month of purchase, cost and funding sources.	Ongoing
O. Inter-Agency Communications	
1. The NDEQ point of contact for communications submitted under this section is Tracy Thompson, unless an alternative contact is specifically requested.	
2. NDEQ commits to providing LLCHD timely information on issues that come to its attention which relate to air quality work, e.g. correspondence, notifications, guidance, etc. which may be addressed only to State agencies from EPA	Ongoing
3. LLCHD agrees to coordinate state/local conference calls as per the agreed schedule.	Ongoing
4. NDEQ and LLCHD commit to informing each other of activities, regulations or policies being considered so that there is consistency between programs.	
5. Decision-Making / Technical Support: Any request for decision-making or technical support shall be made in writing, with support documentation provided as needed or requested.	Ongoing

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

6. LLCHD agrees to consult with NDEQ on consistency/uniformity/communication matters relating to construction/Non-Title V operating permits and violations before consulting with the EPA.	Ongoing
7. LLCHD will participate in state/EPA teleconferences or meetings every other month to discuss air and NESHAPs asbestos compliance/enforcement issues. Multi-media and pollution prevention activities will be discussed. At least 2 meetings will be held; one each during the second and fourth quarters.	Ongoing per schedule of events
8. EPA - LLCHD Interactions: LLCHD shall: a. Inform NDEQ of any meetings with EPA; and b. Provide NDEQ with copies of EPA correspondence that may be addressed only to LLCHD.	Ongoing
9. MBE/WBE "Fair Share" Annual Report The MBE/WBE report is due annually and should be submitted to Stephanie Vap-Morrow, NDEQ.	October 30, 2011 October 30, 2012
10. Financial Reports LLCHD shall submit to NDEQ expenditure reports with reimbursement requests. The reports must itemize the work performed and the equipment purchased during the period for which reimbursement is sought.	Submit with invoices
11. Information Requests: LLCHD shall provide information relative to activities carried-out using §105 grant funding, as requested by the NDEQ.	Ongoing as requested

§5 Program Commitments	Time Table
P. Electronic Communications:	
1. LLCHD will provide compliance and permitting summary information relative to both stationary sources on a monthly basis. Asbestos information will be submitted to NDEQ quarterly via an Excel spreadsheet. Stationary source activities will be entered into AIRS Facility Subsystem (AFS). The information will include the minimum mandatory data elements required nationwide. Information will be entered by the 8 th of each month. The information submitted will include the minimum data elements identified in Appendix E in the AIRS/AFS Technical Support Document, Version 2, July 17, 2002.	Monthly
2. NDEQ will periodically review the AIRS and the Asbestos Excel spreadsheet information. Any questionable information concerning LLCHD sources will be brought to the LLCHD's attention for possible correction. The LLCHD, State and EPA agree to cooperatively address any data transfer problems that may be recognized.	Quarterly

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

3. Data that is electronically transmitted by LLCHD will only be changed by LLCHD, from the original submittal, unless otherwise agreed to by LLCHD	Quarterly
4. LLCHD commits to working with the NDEQ to facilitate electronic access to LLCHD data as needed	Ongoing
Q. Training	
1. All personnel responsible for data collection/reviews shall complete training consistent with their responsibilities (for Ambient Monitoring QA requirements see L.1). As resources allow, LLCHD will encourage additional training and education for its employees in the program as needed and appropriate.	Ongoing
2. As resources allow, the LLCHD will participate in EPA data management work groups, and national and regional AIRS conferences charged with identifying the system enhancements necessary to improve data management	Ongoing
3. Maintain a training list for all staff members that goes back at least 3 years. Training list is to include: Name/Description of Training, Number of Attendees, Date(s), Location, and funding source(s).	Annual
R. Public Education and Outreach	
1. LLCHD will continue to educate the public regarding air quality data and issues under Lincoln Lancaster County Health Department Air Quality's jurisdiction. This will include providing the following EPA produced materials when available: Best Workplace for Commuters, Clean School buses, and Smartway Transport. LLCHD will keep track of training provided to employees that is funded with 105 grant funds and report such training annually.	Activities are ongoing Report: Annual
2. LLCHD will participate in educational events sponsored by EPA when appropriate and when resources allow.	Ongoing
3. LLCHD will encourage industry to seek voluntary reductions in air toxics when the opportunities occur.	Ongoing

PART II. Federal Grant Requirements

NDEQ will provide pass through money to LLCHD to carryout the monitoring program in Lincoln Lancaster County. LLCHD will be responsible for providing a minimum 40% match to the federal funding it receives. The NDEQ will inform LLCHD of federal funding available at such time the EPA lets NDEQ know of its allocations each year.

The following cooperative agreement conditions shall be complied with by all recipients of federal grant funds.

- Federal Register, Vol. 53, No. 102, Debarment and Suspension under EPA, Assistance Loan and Benefit Programs.
- General Compliance, 40 CFR Part 33, requirements of EPA's Program for Utilization of Minority and Women's Business Enterprises (MBE/WBE) in procurement under assistance agreements.
- Six Good Faith Efforts, 40 CFR Part 33, Subpart C, requiring good faith efforts in procuring construction, equipment, services and supplies under an EPA financial assistance agreement. Records documenting compliance with the six good faith efforts shall be retained:
 - (1) Ensure that Disadvantaged Business Enterprises (DBEs) are made aware of contracting opportunities to the fullest extent practicable through outreach and recruitment activities.
 - (2) Make information on forthcoming opportunities available to DBEs and arrange time frames for contracts and establish delivery schedules, where the requirements permit, in a way that encourages and facilitates participation by DBEs in the competitive process.

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

- (3) Consider in the contracting process whether firms competing for large contracts could subcontract with DBEs.
- (4) Encourage contracting with a consortium of DBEs when a contract is too large for one of these firms to handle individually.
- (5) Use the services and assistance of the Small Business Administration and Minority Business Development Agency of the Department of Commerce in finding DBEs.
- (6) If the prime contractor awards subcontracts, require the prime contractor to take the steps in paragraphs (1) through (5) of this section.
- MBE/WBE Reporting, 40 CFR Part 33, sections 33.502 and 33.503, requirement to complete and submit EPA Form 5700-52A, "MBE/WBE Utilization Under Federal Grants, Cooperative Agreements and Interagency Agreements" beginning with the Federal fiscal year reporting period the recipient receives the award, and continuing until the project is completed. The reports must be submitted annually.

A copy of this form can be downloaded at: www.epa.gov/region7/economics/repforms.htm . Printable copies are also available from the NDEQ upon request.

The MBE/WBE reports need to be submitted to Stephanie Vap-Morrow, NDEQ.

PART III. Disbursements

The funds available for disbursement for this work plan are specified in the table below.

FFY 2011 Section 105 LLCHD Grant Budget

<u>Budget Category</u>	<u>Section 105 Funds</u>	<u>Local Matching Funds</u>
Personnel	\$85,500.00	\$27,800.00
Benefits	\$6,780.00	\$3,600.00
Contractual (office rent, data processing)	\$4,720.00	\$9,700.00
Supplies		\$3,050.00
Other (utilities)		\$1,900.00
Travel		\$6,400.00
Equipment		
TOTAL DIRECT		
Indirect		\$22,990.00
TOTAL	\$97,000.00	\$75,440.00

FTE Estimate: 1.75

The total cost of this Cooperative Agreement shall not exceed \$97,000.00 in grant funds annually. The NDEQ shall provide LLCHD with \$97,000 in Section 105 Grant funds under this cooperative agreement in FFY11. LLCHD shall match those funds with a minimum match of 40% under this cooperative agreement in FFY11.

FFY 2012 Section 105 LLCHD Grant Budget

<u>Budget Category</u>	<u>Section 105 Funds</u>	<u>Local Matching Funds</u>
Personnel	\$85,500.00	\$27,800.00
Benefits	\$6,780.00	\$3,600.00
Contractual (office	\$4,720.00	\$9,700.00

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

rent, data processing)		
Supplies		\$3,050.00
Other (utilities)		\$1,900.00
Travel		\$6,400.00
Equipment		
TOTAL DIRECT		
Indirect		\$22,990.00
TOTAL	\$97,000.00	\$75,440.00

FTE Estimate: 1.75

The total cost of this Cooperative Agreement shall not exceed \$97,000.00 in grant funds annually. The NDEQ shall provide LLCHD with \$97,000 in Section 105 Grant funds under this cooperative agreement in FFY12. LLCHD shall match those funds with a minimum match of 40% under this cooperative agreement in FFY12.

Reimbursement Requests: LLCHD is responsible for submitting requests to Tracy Thompson, Project Coordinator, NDEQ Air Quality Division. Reimbursement requests must itemize the work performed and the equipment purchased. Final reimbursement requests should be submitted no later than 30 days following the end of the grant period.

NDEQ Review/Payment: NDEQ is responsible for reviewing reimbursement requests, and notifying LLCHD within 10 days of any deficiencies or ineligible costs. Payment to LLCHD is to be made within thirty (30) working days for properly documented and eligible costs. The NDEQ shall not be held responsible for delays in payment due to causes beyond its control.

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

PART IV. AUTHORIZATION

LINCOLN LANCASTER COUNTY
HEALTH DEPARTMENT

NEBRASKA DEPARTMENT OF
ENVIRONMENTAL QUALITY

By: _____
Chris Beutler, Mayor
City of Lincoln

By: Thomas R. Lamberson
Thomas R. Lamberson
Deputy Director of Administration

Date: _____

Date: April 21, 2011

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

ATTACHMENT A

LLCHD Section 105 Air Monitoring Network Summary Description:

Parameter	AIRS ID	SITE	Collocated
CO	31-109-0018	2620 O ST, Lincoln	No
O3	31-109-0016	1 st & Maple St, Davey	No

****PM2.5 is funded under 103 grant**

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

ATTACHMENT B

Semi-Annually report the following for all activities below funded by 105:

Compliance Activity	Conducted
Inspections (regulatory activities only; does not include asbestos or complaint inspections)	
Complaints (regulatory activities only)	
Complaints referred to other programs	
Complaints resulting in onsite inspections	
Complaints Resolved (regulatory activities only)	

Compliance Activity	Conducted
Stack Tests Scheduled	
Stack Tests Observed	
Continuous Emission Monitoring onsite observations conducted	
Continuous Emission Monitoring Audits Reviewed	

Excess emission and coal analysis reports		
Number of reports that exceed 5% excess emissions based on the emission unit's operational time.		
Number of reports that exceed 5% monitor downtime based on the emission unit's operational time.		

Acid Rain Activity	Conducted	
Field Reviews of Phase II Facilities	Number of field reviews conducted (RATA's seen)	Number of Phase II affected units in the State
RATA Desk Audits	Number of RATA tests reports reviewed	Number of Phase II affected units in the State
Number of Enforcement Actions		

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

Number of Sources Reached with Compliance Assistance	
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Enforcement Activity	Semi-Annual Estimate
Notices of Violations Issued	
Cases pending at Beginning of Period	
New Cases Opened	
Cases Closed or Resolved	
Cases Pending at end of Reporting Period	
Letters of Warning Issued	

Open Burning	Semi-Annual Estimate	Asbestos	Semi-Annual Estimate
Issued		Notifications	
Denied		Inspections	

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

ATTACHMENT B continued

Permitting	Semi-Annual estimates for Operating Permits	Semi-Annual estimates for Construction Permits
Pending/Extended Beginning Total (ending total of the previous report)		
Applications/Modifications Received this reporting period		
Action Taken this reporting period (completed, issued, denied, or no permit necessary)		
Ending Total (pending/extended end of report)		
	State Action within 90 days	
	PSD Permits within 90 days	
	State Toxics BACT decisions	
	PSD BACT decisions	
	112(g) decisions	
	Variances Issued	

Outreach Activity	Semi-Annual Estimate	Emission Inventories	Semi-Annual Estimate
Meetings Conducted/Meeting Presentations		On-site Audits	
Onsite Visits Providing Assistance		Facilities Submitting Inventories for 2005	Semi-annual Estimate
Industry/Trade Shows		Class I	
		Class II	
		No Operating Permit Required	
		Low Emitter	

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

ATTACHMENT C

Annually report the following for all activities below funded by 105

Hazardous Air Pollutants:

Source*	Updated Estimates (09/30/10 Data)	
	Sources Identified	Negative Declarations
Dry Cleaning (Subpart M)		
Chromium Electroplating (Subpart N)		
Ethylene Oxide Emissions for Sterilization (Subpart O)		
Paint Stripping and Misc., Surface Coating (Subpart 6H)		
Hospital Ethylene Oxide Sterilizers (Subpart wwwww)		
Halogenated Solvents (Subpart T)		
Gasoline Distribution (Subpart R)		
Aerospace (Subpart GG)		
Wood Furniture (Subpart JJ)		
Printing & Publishing (Subpart KK)		
Hazardous Waste Combustors (Subpart EEE)		
Pharmaceutical Production (Subpart GGG)		
Natural Gas Extraction and Storage (Subpart HHH)		
Portland Cement (Subpart LLL)		
Secondary Aluminum (Subpart RRR)		
Publicly Owned Treatment Works (Subpart VVV)		
Municipal Solid Waste Landfills (Subpart AAAA)		
Organic Liquids Distribution (non-gasoline) (Subpart EEEE)		
Miscellaneous Organic Chemical Production (Subpart FFFF)		
Solvent Extraction for Vegetable Oil (Subpart GGGG)		
Surface Coating of Automobiles & Light-Duty Trucks (Subpart IIII)		
Paper & Other Web Coating (Subpart JJJJ)		
Miscellaneous Metal Parts Surface Coating (Subpart MMMM)		
Fabric Printing, Coating & Dyeing (Subpart OOOO)		
Plastic Parts & Products Surface Coating (Subpart PPPP)		
Metal Coil Coating (Subpart SSSS)		
Boat Manufacturing (Subpart VVVV)		
Reinforced Plastic Composites (Subpart WWWW)		
Combustion Turbines (Subpart YYYY)		
Reciprocating Internal Combustion Engines (Subpart ZZZZ)		
Site Remediation (Subpart GGGGG)		
Chemical Manufacturing (area sources) (Subpart VVVVVV)		
Prepared Feeds Manufacturing (Subpart DDDDDDD)		
Gasoline Bulk Terminals (Subpart BBBB BB)		

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

Gasoline Dispensing (Subpart CCCCCC)		
Iron & Steel Foundries (area sources) (Subpart ZZZZZ)		
Wood Preserving Sources (Subpart QQQQQQ)		
Plating & Polishing (Subpart WWWWWW)		
Metal Fabrication & Finishing (Subpart XXXXXX)		
TOTALS		

FFY 2011-2012 Work Plan for LLCHD: Section 105 Air Quality Program

ATTACHMENT C

Annually report the following for all activities below funded by 105

Ambient Monitoring

Ambient Monitoring	Annual Estimate
Include list of all monitors providing under 75% complete data, their % complete data, an explanation of the problem(s) encountered and corrective actions taken.	
List any network changes requested and approximate date of requests made in the current Federal fiscal year.	
List sites and date of closure of any sites subject to unplanned closures within the current Federal fiscal year	
Report completed quarters over the last year.	
Explain any incomplete or late submittals.	
Were there any NAAQS violations or levels that indicate a pending NAAQS violation? If so, explain.	
List all QAPPS and SOPS developed by LLCHD	
Copy of QAPP submitted to NDEQ for review? If, no provide explanation and timeline for submittal.	

EMPLOYEE TRAINING CONDUCTED THIS PERIOD

TYPE OF TRAINING	DATE	HOURS	# ATTENDEES